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December 10, 2024

**Via CM/ECF Only**

The Honorable Mary Kay Vyskocil, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 18C  
New York, NY 10007

USDC SDNY  
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**Re: Gustave Lipman, as Executor for the Estate of Ira Lipman  
v. Arthur J. Gallagher Risk Management Services, LLC  
Case No. 1:24-cv-8656-MKV**

Dear Judge Vyskocil:

This will respond to Plaintiff's request for a one-week extension of its deadline to file an amended complaint. Defendant has no objection to such an extension, but objects to Plaintiff's proposal that places Defendant's fourteen (14) days to respond directly over the holidays.

This could not have been lost on Plaintiff's counsel, particularly where the "good cause" for the extension is: (1) Plaintiff's need for "longer than one week to finish gathering the information Plaintiff intends to include in an amended pleading"; and (2) Plaintiff's attorneys' own year-end business and personal commitments. The suggestion that two weeks directly over the holidays would be appropriate for Defendant and its attorneys to analyze, make strategy decisions and draft a responsive pleading for a brand-new amended complaint with a cornucopia of new facts (i.e., the quantity of facts that will purportedly take Boise Schiller Flexner an extra week to fully unearth) gives the impression that Plaintiff's request for an extension is not actually presented for good cause but rather as a procedural maneuver designed to prejudice Defendant and its attorneys during a time when good will should be expected.

Defendant respectfully requests that the Court establish Friday, January 17, 2025 as Defendant's deadline to respond to the amended complaint. Defendant has no objection if the Court wants to maintain the fourteen (14) day response time and extends Plaintiff's time to file an amended complaint to Friday, January 3, 2025.



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We look forward to moving this case forward and appreciate Your Honor's consideration.

Respectfully submitted,

*/s/ Samuel J. Thomas*

Samuel J. Thomas

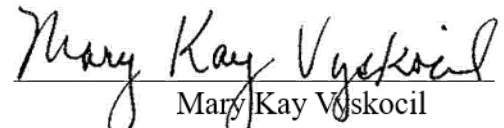
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Benjamin Margulis, Esq. – via email, [BMargulis@BSFLLP.com](mailto:BMargulis@BSFLLP.com)

Both parties' requests for extensions of time [ECF Nos. 11, 12] are GRANTED. The Amended Complaint is due December 30, 2024. Defendant's response is due January 17, 2025. Plaintiff's opposition is due January 31, 2025. Any reply is due February 7, 2025.

The Clerk of Court respectfully is requested to terminate the letter motion at ECF No. 11.

Date: Dec. 10, 2024  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge